

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA,)	
Petitioner)	
)	
v.)	Civil Action No. <u>13-10213</u>
)	
JUAN CARLOS NAVARETTE-BELTRAN,)	
(Reg. No. 22420-057))	
Respondent)	

MOTION TO IMPOUND

Petitioner, the United States of America, hereby moves pursuant to Local Rule 7.2 to impound the Risk Assessment Report to be filed in support of its 18 U.S.C. § 4246 Petition for a Hearing to Determine the Present Mental Condition of the Respondent, Juan Carlos Navarette-Beltran. In support of this Motion, Petitioner asserts that a review of this document is necessary to resolve this Petition, and given the confidential nature of the psychiatric records and materials contained in the Report, impoundment is appropriate to protect the Respondent's privacy.

WHEREFORE, Petitioner requests that this motion be granted, and that the United States be permitted to file the referenced Risk Assessment Report under seal. Petitioner further requests that the Court order that the document remain under seal until resolution of the issue presented in the Petition, and that following hearing and resolution the document be returned to the undersigned Assistant United States Attorney. A proposed Order of Impoundment is attached.

Respectfully submitted,

CARMEN M. ORTIZ
United States Attorney

By: /s/ Jennifer A. Serafyn
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Dated: February 4, 2013

CERTIFICATE OF SERVICE

This is to certify that on this date a copy of the foregoing will be sent to Respondent's counsel at the following address:

William W. Fick, Esq.
Assistant Federal Defender
Federal Public Defender Office
51 Sleeper Street, 5th Floor
Boston, MA 02210

Dated: February 4, 2013

/s/ Jennifer A. Serafyn
Jennifer A. Serafyn
Assistant U.S. Attorney